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June 26, 2023

Hon. James B. Clark III
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut St
Newark, New Jersey 07102

Re: Live Universe Inc. v. Muijres, et. al.
Case No. 2:22-04918

Dear Judge Clark:

I represent plaintiff and write respectfully to request a second 30 day extension for plaintiff to respond to defendants' motions to dismiss. There are extensive motions to dismiss filed by several defendants on multiple grounds. My office has filed an application to withdraw now returnable July 3, 2023. The date for filing of opposition to the various motions to dismiss is July 6, 2023. Dkt entry 44.

I would respectfully request that the date for plaintiff's response to the dismissal motions be adjourned to August 6, 2023. The current window between the date to address the motion to dismiss and file opposition is narrow, particularly given the number of papers filed by defendants. I respectfully believe additional time will be needed for preparation of the required papers and would ask that the extension be granted so that the motions can be properly addressed and handled on the merits.

Respectfully yours,

Howard Gutman

Howard A. Gutman

cc: all counsel, Maria Guerrero, Esq.